

Exhibit 2

Ty Clevenger
 212 S. Oxford Street #7D
 Brooklyn, New York 11219
tyclevenger@yahoo.com

INVOICE

April 25, 2022

Date	Time	Expense	Purpose
5/31/2020	1.2		Draft FOIA suit
6/1/2020	1.1		Finish and file FOIA suit
6/1/2020		\$400	Filing fee
6/5/2020	1		Service of summons
6/23/2020	0.3		Review letter from DOJ; call DOJ and leave message
			Teleconf. w/ V. Valenzuela about DOJ needing additional time
6/30/2020	0.2		
7/5/2020	0.5		Draft First Amended Complaint
7/6/2020	0.6		Draft First Amended Complaint
7/7/2020	1.2		Finish First Amended Complaint; Draft subpoenas
7/8/2020	0.6	\$22.60	Service of FAC
			Review answer; compare to Brooklyn case; email to AUSA Parker
8/12/2020	0.6		
10/2/2020	0.7		Initial disclosures
12/26/2020	1.2		Draft opposition to motion to stay
12/28/2020	1.4		Draft opposition to motion to stay
			Draft opposition to motion to stay (organize supporting exhibits)
12/29/2020	1.6		
12/30/2020	0.7		Finish and file opposition to motion to stay
1/6/2021	1.3	\$15.05	Prepare and send hard copy; review D reply
1/7/2021	1.1		Draft and file surreply to motion to stay
1/19/2021	2.4		Online research; draft response to D proposed schedule
			Draft motion for leave to file; finish and file two motions & proposed order
1/20/2021	1.2		
4/8/2021	0.3		Review interim records from OIP; notify client
4/8/2021	0.2		Review 2nd motion for stay
4/13/2021	0.9		Draft and file opposition to motion for stay
4/21/2021	0.4		Review reply ISO 2nd motion for stay
4/23/2021	1.1		Review production from FBI
			Research and draft motion for in camera review / declassification
5/21/2021	6.6		
6/5/2021	1.3		Work on motion for in camera review / declassification
6/11/2021	5.1		Work on motion for in camera review / declassification
6/12/2021	2.2		Update motion for in camera review
6/13/2021	2.8		Update motion for in camera review; send draft to AUSA

6/14/2021	2.4		Update motion; compile exhibits; email AUSA; file motion
6/15/2021	1.1		Draft and file motion for excess pages; consult w/ AUSA; amend and file motion for in camera review
6/17/2021	0.7		Produce chambers copy
6/19/2021	1.1	\$94	Finalize and mail chambers copies (\$72.10 for printing and \$21.90 USPS delivery)
6/28/2021	0.9		Review opposition & research cases on Westlaw
7/5/2021	1.2		Draft and file reply ISO motion for in camera review
7/8/2021	0.2		Exchange emails w/ A. Parker about production
7/15/2021	0.3		Review production from FBI and email A. Parker
7/28/2021	0.1		Email A. Parker
7/31/2021	0.1		Email A. Parker
8/9/2021	0.2		Exchange emails w/ A. Parker about briefing schedule
10/26/2021	0.3		Confer w/ B. Huddleston and email A. Parker
11/1/2021	0.8		Confer w/ client and A. Parker; review FBI proposals
11/2/2021	0.4		Exchange emails w/ A. Parker
11/4/2021	0.2		Discuss FBI proposal w/ B. Huddleston
11/5/2021	0.3		Confer w/ B. Huddleston and email A. Parker about briefing schedule
12/15/2021	0.3		Trade emails about FBI production
12/16/2021	0.1		Trade emails about no-records responses
12/22/2021	0.2		Trade emails about OTD and DITU
1/5/2022	2.4		Draft email response re FBI search; draft and file motion for extension
1/18/2022	1.2		Westlaw research on sufficiency of search, esp. databases
1/21/2022	2.3		Westlaw research on sufficiency of search
1/22/2022	3.1		Review production; Westlaw research
1/23/2022	2.7		Westlaw research and draft opposition to MSJ
1/24/2022	1.1		Westlaw research on Fourth Amendment and database searches
2/2/2022	3.6		Draft response to MSJ
2/3/2022	5.4		Legal research; draft response to MSJ
2/4/2022	3.9		Legal research; draft response to MSJ
2/5/2022	4.7		Legal research; draft response to MSJ
2/6/2022	6.3		Legal research; draft response to MSJ
2/7/2022	11.1		Legal research; draft response to MSJ
2/8/2022	3		Finalize and file MSJ
2/13/2022	1.2		Prepare and send hard copies to chambers
2/22/2022	0.3		Exchange emails w/ A. Parker; confer w/ client by email
2/23/2022	0.4		Teleconf. w/ client; exchange emails w/ A. Parker
2/26/2022	0.3		Review motion for summary judgment

3/30/2022	0.6	Review draft status report; review cross-motion; draft and send portion of status report
4/24/2022	3.2	Update billing; prepare invoice; draft motion for attorney fees
4/25/2022	2.1	Confer w/ A. Parker; review FBI production to date; finalize fee request and file
Total	109.6	\$531.65
	109.6x500=	<u>\$54,800</u>
Grand Total		\$55,331.65